



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 20, 2017

Kelly Rahn
Agent for RBR Productions, Inc.
c/o Technology Sciences Group, Inc.
712 Fifth Street, Suite A
Davis, CA 95616

Subject: Notification per PRN 98-10 – add Prop 65 language
Product Name: Let's Touch
EPA Registration Number: 62296-1
Application Date: 05/29/2017
Decision Number: 530107

Dear Ms. Rahn:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact Tom Luminello at 703-308-8075 or via email at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Tom Luminello".

for Jacquie Hardy, Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

[LOOSEN CAP TO FILL RESERVOIR
DO NOT SQUEEZE BOTTLE WHILE POURING]

ISABEL CRISTINA
LET's Touch®

[DOES NOT RUST]
[DOES NOT DULL]
[NO RUST!!!]

HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT

**For Disinfection and Storage of All
Quality Metal Instruments Used In Salons**

Bactericidal Virucidal	Fungicidal Staphylocidal	Tuberculocidal Pseudomonacidal
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ACTIVE INGREDIENTS:

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact the Poison Control Center 1-800-222-1222 for emergency medical treatment information.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Contents: _____

**ISABEL CRISTINA
THE PERFECT BLEND OF BEAUTY AND SCIENCE**

Manufactured by:
RBR Productions Inc.
P.O. BOX 766, Hartwell, GA 30643, USA
Tel: (800) 247-4130 • 706-376-8189
EPA Reg. No. 62296-1 EPA Est. No. 62296-GA-1

NOTIFICATION

62296-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/20/2017

LET'S TOUCH®

LET'S TOUCH® is a hospital and tuberculocidal disinfectant concentrate especially formulated for the beauty care profession. It provides broad spectrum protection: bactericidal, fungicidal, virucidal, staphylocidal, pseudomonacidal, tuberculocidal, and prevents cross contamination from all metal salon instruments when used as directed. Use it to disinfect all pre-cleaned metal salon instruments including manicurist nippers and cuticle pushers, shears and metal skin care instruments. Let's Touch® does not rust or dull quality metal instruments, is pH buffered, and is biodegradable.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Before immersion in Let's Touch®, all instruments and devices must be thoroughly cleaned to remove excess dirt, rinsed and rough dried. The removal of heavy soils and the cleaning of all surfaces prior to application of this product is required. When using Let's Touch® for the first time, thoroughly clean and rinse trays and containers in order to remove any residues. Mixing Let's Touch® in a container which had another disinfectant in it can cause a brown gel-like substance to form. If this happens, thoroughly clean and rinse all contaminated instruments, trays or containers and remix Let's Touch®.

Use one part Let's Touch® to 32 parts water for disinfection of pre-cleaned metal instruments and equipment. Let's Touch® is distributed in concentrated form in Twin-Neck containers and in 1 oz. [bottles] [packets.]

DIRECTIONS FOR MIXING WITH [BOTTLES] [PACKETS] AND TWIN-NECK CONTAINER

Water	1 Pint (16 oz.)	1 Quart (32 oz.)	1/2 Gallon (64 oz.)	1 Gallon (128 oz.)
Let's Touch®	1/2 fl. oz.	1 fl. oz. or 1 [bottle][packet]	2 fl. oz. or 2 [bottles][packets]	4 fl. oz. or 4 [bottles][packets]

Always add 1 [bottle] [packet] or 1 oz. of Let's Touch® to every 32 fl. oz. of water. When using the Twin-Neck container, squeeze the bottle until the easy-measure reservoir is filled to the desired amount.

DIRECTIONS FOR MIXING WITH THE MANICURIST AND HAIR STYLIST SYSTEMS

Manicurist System

1. Fill the tall plastic mixing jar to the 32 oz. Fill Line with water.
2. Add 1 oz. of Let's Touch® [1 [Bottle] [Packet]. Cap & mix by turning upside down a few times.
3. Pour the mixed solution into the glass manicurist jar to the suggested use level line.
4. Store the remaining solution until needed.

Hairstylist System

1. Remove the plunger mechanism.
2. Fill the glass jar to the 32 oz. Fill Line with water.
3. Add 1 oz. of Let's Touch® [1 [Bottle][Packet]. Mix solution by replacing plunger and moving it up and down.

Always leave instruments in Let's Touch[®] solution at all times and overnight for storage. Replace solution daily, or earlier if cloudy or dirty.

FOR INSTRUMENT DISINFECTION: After cleaning instruments, place articles in Let's Touch[®] solution for ten minutes.

NOTE: Articles must be fully submerged in solution at all times.

FOR METAL INSTRUMENT STORAGE: A solution of one part Let's Touch[®] to 32 parts water (see above for mixing instructions) does not rust or dull, and does not stain or otherwise attack metal instruments such as quality salon shears, manicurist and skin care implements. The solution may be used for prolonged (overnight) storage of all but non metal instruments, plastic or rubber items.

[PEEL OFF THIS PANEL FOR ADDITIONAL INFORMATION AND PRECAUTIONARY STATEMENTS]

LET'S TOUCH[®] IS A COMPLETE PRODUCT. DO NOT MIX WITH OTHER CHEMICALS. Use only as directed. If frozen, thaw and remix before use. Let's Touch[®] is recommended for use in salons, hospitals, dental offices or other facilities requiring disinfection of metal instruments.

FOR HOSPITAL AND DENTAL OFFICE USE: Let's Touch[®] is a concentrated disinfectant to be used at a 1:32 dilution with water for cold decontamination/disinfection of precleaned equipment. For disinfection immerse instruments for 10 minutes.

This product is not to be used as a terminal sterilant/ high level disinfectant on any surface or instrument that (1) is introduced with the bloodstream or normal sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

The 1:32 dilution kills pathogenic bacteria and fungi such as *S. Aureus*, *S. cholersuis*, *Ps. aeruginosa*, *M tuberculosis* (effective in 10 minutes at 20° C), and *C. albicans*. Let's Touch[®] is virucidal against Influenza A2 (Hong Kong), Herpes Simplex 1 and 2, Adenovirus Type 2 and Vaccina on hard inanimate surfaces in 10 minutes at 20° C. A 1:32 dilution is effective against *M tuberculosis* on hard, inanimate surfaces in 10 minutes at 20° C. Remove heavy soil or gross filth and thoroughly clean surfaces.

When tested by the EPA approved Dilution Method the HIV-1 (AIDS) virus was completely inactivated by a 1:32 solution in 10 minutes at 25° C.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Harmful if swallowed. Avoid prolonged skin contact. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Commercial Use:

PESTICIDE STORAGE: Store only in original container away from heat or open flame. Keep container closed when not in use. Storage must be secured sufficiently to make product inaccessible to children or persons unfamiliar with its proper use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING - (*For containers greater than 5 gallons*): Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

(*For containers equal to or less than 5 gallons*): Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

Household / Residential Use:

CONTAINER HANDLING - Nonrefillable container. Do not reuse or refill this container. Securely wrap original container in several layers of newspaper and discard in trash or offer for recycling if available.

KILLS HIV (AIDS VIRUS) ON PRECLEANED ENVIRONMENTAL SURFACES/ OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS).

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV (AIDS VIRUS) OF SURFACES/OBJECTS SOILED WITH BLOOD AND BODY FLUIDS

Personal Protection: Disposable latex or vinyl gloves, gowns, masks and/or eye coverings, as appropriate must be worn during all cleaning and decontamination procedures of blood and other body fluids.

Cleaning Procedures: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before applying disinfectant.

Disinfectant Use and Contact Time: Effective against HIV-1 (AIDS virus) on hard non-porous surfaces/objects in the presence of organic soil (5% blood serum). Prepare disinfectant by mixing one part Let's Touch[®] to 32 parts water. Leave surfaces wet for 10 minutes.

Disposal of Infectious Material: Blood and other fluids should be autoclaved and disposed of according to Federal, State and local regulations for infectious waste disposal.

ENVIRONMENTAL HAZARDS

(For containers 5 gallons or greater): This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Batch No.:

Note to Reviewer: The following text is optional and any of the following three statements may be used.

[{SYMBOL – Equilateral triangle containing exclamation point} **WARNING:** This product can expose you to ortho-phenylphenol, which is known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.]

–OR–

[{SYMBOL – Equilateral triangle containing exclamation point} **WARNING:** Cancer-www.P65Warnings.ca.gov.]

–OR–

[Proposition 65: Warning: This product contains a chemical known to the State of California to cause cancer.]

MANICURIST SYSTEM BOX LABEL - (Optional box language)

METAL TOOL DISINFECTANT
MANICURIST KIT

NO RUST!!!

ISABEL CRISTINA

LET's Touch®

HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT

DOES NOT RUST

DOES NOT DULL

STORES QUALITY METAL INSTRUMENTS OVERNIGHT

Bactericidal

Fungicidal

Tuberculocidal

Virucidal

Staphylocidal

Pseudomonacidal

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

CONTENTS:

- One Full Immersion Glass Instrument Jar with Stainless Steel Lid, Basket and Plunger for Easy Placement and Removal of Instruments
- One 32 oz. Solution Preparation and Storage Container with Leak Proof Cap
- Four 1 ounce Let's Touch® Disinfectant [Packets][Bottles] Makes 4 Quarts
- Client Awareness Card

ACTIVE INGREDIENTS:

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients	93.76%
TOTAL	100.00%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

ISABEL CRISTINA

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Tel: (800) 247-4130 • 706-376-8189

STYLIST SYSTEM BOX LABEL - (Optional box language)

METAL TOOL DISINFECTANT
STYLIST KIT

NO RUST!!!

ISABEL CRISTINA

LET'S Touch®

HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT

DOES NOT RUST

DOES NOT DULL

STORES QUALITY METAL INSTRUMENTS OVERNIGHT

Bactericidal

Fungicidal

Tuberculocidal

Virucidal

Staphylocidal

Pseudomonacidal

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

CONTENTS:

One 32 oz. Full Immersion Glass Instrument Jar with Stainless Steel Lid, Basket and Plunger
for Easy Placement and Removal of Instruments • Ten 1 ounce Let's Touch®
Disinfectant [Packets][Bottles] Makes 10 Quarts • Client Awareness Card and Window
Decal

KEEP OUT OF REACH OF CHILDREN

WARNING

See enclosed [packets][bottles] for additional precautionary statements.

ACTIVE INGREDIENTS:

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

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Tel: (800) 247-4130 • 706-376-8189

BOX LABEL - (Optional box language)

DISINFECTANT REFILL [PACKETS][BOTTLES]

NO RUST!!!

ISABEL CRISTINA

LeT'sTouch®

HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT

DOES NOT RUST

DOES NOT DULL

STORES QUALITY METAL INSTRUMENTS OVERNIGHT

Bactericidal
Virucidal

Fungicidal
Staphylocidal

Tuberculocidal
Pseudomonacidal

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

KEEP OUT OF REACH OF CHILDREN

WARNING

See enclosed [packets][bottles] for additional precautionary statements.

ACTIVE INGREDIENTS:

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

CONTENTS: 12-1 Ounce [Packets][Bottles] (29.5 ml)

ISABEL CRISTINA
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Tel: (800) 247-4130 • 706-376-8189

(Included in kits) SALON WINDOW DECAL FOR LET'S TOUCH® DISINFECTANT - (Optional language)

**THIS SALON DISINFECTS
QUALITY METAL INSTRUMENTS WITH
LET'S TOUCH®
DISINFECTANT**

ISABEL CRISTINA
the perfect blend of beauty and science

**Hospital & Tuberculocidal Disinfection
In 10 Minutes**

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1